

April 20, 2004

The Federal Communications Commission
Washington, D. C. 20554

Subject: Comments concerning RM-10867

Dear Commissioners:

Having reviewed many of the comments previously submitted concerning RM-10867, I have to say that the comments by Walt Fair, W5ALT and Bob Rightsell, AE4FA most closely agree with my feelings toward this RM. So, to keep this missive as short as possible I will not repeat what they have already said so well. I will however ask the Commission to consider their comments very seriously.

Instead, I would like to present you with the following concerning testing standards for an Amateur Radio Licence:

An attorney goes to school for 6 or more years to become a lawyer. Then s/he must pass a bar exam to practice law. This is a rigorous program and it assures not that an attorney is ready to practice law, but that the attorney has enough knowledge to be able to find the answers s/he needs to solve the clients problems. Most attorneys work for a law firm as an 'apprentice' for some time before taking on major cases on their own or becoming the lead attorney on very important cases. The schooling shows the world the individual has the dedication it takes to become an attorney. The testing shows that the attorney has the practical knowledge to pursue their career. The 'on the job training' gives the practical experience necessary to be a top notch attorney capable of the real responsibilities concerning their career choice.

Amateur Radio is not a profession as demanding as being an attorney. However, this avocation has similar requirements in order to assure that qualified, dedicated persons are licenced to the Amateur Service. The schooling is largely self taught and the various teaching tools available are of very different quality in depth of the material covered. Some available courses will teach a candidate what a diode is in order to answer a specific question that is known to be on the test, but does NOT teach the student why the diode does what it does. The student can still answer the question but has no practical knowledge that can be used. The 'on the job training'

is largely accomplished through mentoring from peers [commonly know as 'elmers'] and from actually being 'on-the-air.' If the elmer is knowledgeable then the student gets good solid information. If the elmer is somewhat less than an expert then the information may or may not be of the quality necessary. This leaves the testing phase of becoming an Amateur Radio Operator to keep the gate of entry functioning properly. The tests given to Amateur Radio Operator need to be of the highest quality possible and should give some indication of the actual knowledge level of the candidate. The testing should also be an indication of the dedication of the individual so that the fundamental reason for the Amateur Radio Service as stated in Part 97.1 can be fulfilled.

Just as an attorney needs education, testing and practical experience, the Amateur Radio Operator needs these things in their chose avocation.

I am one of the authors of RM-10807, and highly recommend this document as presenting a method to assure maintaining the high standards of Amateur Radio. Specifically I wish to stress the 'time between upgrades' [paragraph 4.3.1] section as a natural way to promote 'on the job' training and to give the new and intermediate Amateur a chance to become more knowledgeable in their avocation before becoming an expert.

I feel that RM-10867 is too lax on the requirements for the entry level licensee and that the intermediate and expert classes have been watered down by not allowing enough question to adequately test the subject matter. Again I refer you to RM-10807 [paragraph 3.3] for a solution to this problem.

Thank you for you attention:

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